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23 November 1998

Secretary
Federal Communications Commission
1919 M Street N.W.
Washington, D.C. 20554

Re: Comments on NPRM WT Docket 98-143

Dear Sir:

When I first got my ham ticket back in 1957 the ham world was noticeably more regimented as compared with today's ham world. Novices were limited to a one year license and crystal controlled transmitters with 75 watts output. Generals had to wait 5 years before they could upgrade (with no additional privileges). Preparation for higher grade licenses required studying suggested topical areas suggested in the ARRL License Manual and finding a buddy to help you with your code or run a paper tape "instructograph" until you wore the tapes out.. And there was always the possibility of getting cited by an FCC monitoring station for some violation (I got nabbed for a birdies around 18 MHZ and operating at 6.999.8) which kept everybody on their toes.

Life is different today. Activity among Novice Class licensees is almost non-existent. A non-ham can now go into a VE Session and go all the way to Extra in a few purported cases by sheer memory work of test questions and being lucky enough to guess their way through a code test. I suspect that the questionable conduct and offensive operating practices that are widespread today in the ham community are in some part related to the examination pathway into ham radio. Like anything in life, if things come too easy, people don't appreciate them as much. Further, I am often appalled at the technical depth of some Extras who have been licensed in the past 15 years or so. One of my favorite, but somewhat vindictive ploys, is to get into a discussion with a "new extra" on impedance, resistance, and inductive and capacitive reactance. The majority of them just give you a glazed stare wherein a kid coming out of high school level physics can at least wave his hands a little on the topic.

What has not changed is the conceptual approach for taking examinations i.e. there is a technical examination and a communications proficiency examination (with the only choice being CW). What is clear at this point in time is that the Novice Class has served its purpose and that there are other reasonable approaches to demonstrating communications proficiency besides CW, i.e., becoming proficient in EME techniques, repeater operation, digital communication techniques, ATV, UHF (beyond 1 Ghz) technology, etc.

Now bearing in mind that current international trend towards ham licensing requires a 12 wpm code exam for HF and no code for VHF, consider the possibility that the U.S. entry level for VHF work is the Technician Class license with no code requirement, but a relatively rigorous entry level technical exam. The General, Advanced, and Extras would then be required to take increasingly difficult technical examinations, but would be given a choice of their means of

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demonstrating a communications proficiency. Obviously a guy interested in 10 Ghz plus communications techniques has no need to copy 20 wpm on CW; on the other hand the 20 wpm type probably has no interest in the world beyond 10 Ghz. The bottom line is to use the technical exams as a common denominator, but let folks have the option of selecting their preferred communications choice, and the in the process of studying for the exam, become experts in a given subject area that they are truly interested in.

As for the exams, lets return to the tried and true method to realistically demonstrate technical depth instead of demonstrating how well a person can memorize questions. In other words, use a license manual approach with suggested study areas which will require the student to dig deeper on his own to develop a true knowledge. As for the CW exam return to one minute of solid copy at 12 wpm. No guessing. Either pass or no pass.

I'm sure the nay-sayers would respond with comments saying that the ham population will die out, and in turn manufacturers can't sell as much equipment, people will loose jobs, ad nauseam. On the other hand how large a market is there for EME or ATV equipment? Or 10 Ghz transmitters? Not much right now, however, I suspect that a diversification of communication interests would enhance the overall ham market as opposed to shrinking it. The manufacturers would just have to adjust to a new market as everyone else has in this world due to down-sizing, mergers, new product lines, etc.

It's true that by following this approach that there may be some vendor casualties and fewer hams, but at least we would be technically well grounded and into a communication proficiency area where there was interest, and hams would hopefully continue to make contributions to innovative technology as they have so many times in the past.

Specifically addressing the NPRM, it is sensible to stop issuing novice licenses and return the novice bands to use by hams on other modes. Spectrum space is a finite resource and must be used in a manner such as to maximize its use for the service to which the segment is assigned.

Lastly, it's time to restore integrity to ham radio, and the hams can't do it by themselves. We need FCC regulatory and enforcement help to get us back to the 1970 and before integrity level. With this kind of assistance, in a few years we can hopefully be back to the high operating standards of days past and take care of most of our problem areas internally.



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